HUFF & HUFF, INC.
Environmental Consultants

Suite 206, 512 W. Burlington, La Grange, Illinois 60525 • (312) 579-5940

Overnight Mail

June 29, 1987

Illinois Environmental Protection Agency
Division of Land Pollution Control--#24
Permit Section
Post Office Box 19276
2200 Churchill Road
Springfield, IL 62794-9276

Re: Closure Plan Submittal-Estwing Mfg Co.

Gentlemen:

Enclosed please find a Closure Plan prepared for a drum storage hazardous waste facility at Estwing Manufacturing Co., located in Rockford, Il. I trust you will find this plan complete. If you should have any questions, please do not hesitate to call me.

Sincerely

James E. Huff, P.E.

JEH/ms

cc P. Devers, Estwing
T. Henninger, IEPA Rockford Office

CLOSURE PLAN

for

ESTWING MANUFACTURING COMPANY

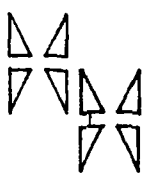
2647 Eighth Street
Rockford, IL 61101

for

DRUM STORAGE AREA

June 26, 1987

Prepared by
Linda L. Huff, P.E.
James E. Huff, P.E.



HUFF & HUFF, INC.
ENVIRONMENTAL CONSULTANTS
LAGRANGE, ILLINOIS

CLOSURE PLAN FOR DRUM STORAGE AREA

1. Description of Facility

Estwing Manufacturing Company is a manufacturer of hammers for camping and individual use (SIC 3423. Located at 2647 Eighth Street in Rockford, Illinois, Estwing Manufacturing Company has occupied this site since 1923. Up to 1983 production averaged 4,000 hammers per day; however, there have been increases in the demand for these hammers. Expansions currently going on in 1987 will increase production to 7,600 hammers per day. Estwing employs 301 people. The plant facility is sited on 7.5 acres with forging shops built separately from other process facilities. The drum storage area to be closed in late 1987 is located south of the forging shops and the main building facility.

In late 1983, a painting operation was added to the maufacturing process. This operation involved manually dipping the hand tools in lacquer. Records were not maintained until October, 1985 when a total of 450 gallons of ignitable hazardous waste was inventoried on the site, or approximately 1,300 kg. Over a 36 month period, this amounts to a generation rate well below 100 kg per month. In early 1986, Estwing filed a "Notification of Hazardous Waste Activity" as the initial step in disposing of this waste. This three year accumulation was shipped to LWD in June 1986. Estwing may have exceeded the 270 days allowed to remove material from the storage area once 1,000 kg was reached. Estwing has agreed to go through a storage area closure as requested by IEPA's Rockford office.

Prior to 1983, there was a small quantity of paint waste generated. This waste and any thinner were added to the quench oil and burned for their heat value in the forge shops. In 1983, the practice of burning the spent organic material was discontinued at Estwing for safety considerations.

Estwing Manufacturing will be a "generator only" facility upon closure of the drum storage area. Estwing generates less than 1,000 kg/mo of hazardous waste.

2. Description of Waste Management Units To Be Closed

The waste management unit to be closed consists of a drum storage area located south of the forging shops. This storage area was originally constructed on an asphalt pad, and upgraded in 1986 to concrete with concrete curbing to contain any spills. The drum storage area (S01) was utilized to store drums which represented approximately 150 gallons per year of spent lacquer, enamel, and paint thinner.

The areas surrounding the drum storage pad can be described as follows:

South of pad - grass prior to employee parking lot
West of pad - grass prior to guard shack at employee entrance

North of pad - asphalt area
East of pad - lacquer storage building

3. Map of Facility

Exhibit 1 depicts the location of the Estwing facility within Rockford. Exhibit 2 depicts the plant layout and location of the drum storage pad.

4. Detailed Unit Drawing

In Exhibit 3, the plan view of the drum storage pad is presented. This drawing shows the dimensions of the pad, curbing, and fencing.

5. Storage Area Pavement Description

The original storage area from 1983 to 1986 consisted of an asphalt section, which was a continuation of the parking and loading areas. There were no curbs on the south end where the asphalt ended. Drainage from this area was directed immediately to the south and then eastward.

In 1986 a concrete layer with curbing was constructed in the storage area. This concrete layer is approximately4 to 7 inches thick and extends over 430.8 sq ft. A concrete curb a

minimum of 2 inches in height was constructed around the perimeter of the storage pad to contain any leaks or spills. The ashalt base was removed prior to pouring the concrete.

6. List of Hazardous Waste

The types and quantities of hazardous waste stored on the pad consisted primarily of spent lacquers, enamels, and paint thinner. Compounds of these D001 wastes include toluene, methyl ethyl ketone, isobutyl alcohol, and n-butyl acetate. The hazardous waste inventory on site is specifically listed below:

Waste Type	Waste
D001	Lacquer thinner (n-butyl acetate)
D001	Lacquers (isobutyl alcohol methyl ethyl ketone butyl acetate ethyl acetate toluene)
D001	Paint (methyl ethyl ketone isobutyl alcohol)

Table 1 summarizes the maximum inventory of waste during the life of the facility.

8. Schedule for Closure

The following timetable represents the proposed schedule for closure activities with respect to the drum storage area:

June 30, 1987	Submittal of Closure Plan
September 30, 1987	Approval of Plan by IEPA
October 31, 1987	Removal of all drums of hazardous waste
November 30, 1987	Decontamination of concrete storage area
December 15, 1987	Testing of drum storage area and surrounding soil
January 15, 1988	Laboratory test results received. Soil removed, if contaminated, and retested.

TABLE 1

MAXIMUM INVENTORY OF WASTE

Material	Maximum Storage	Waste at Time of Closure	Waste Code
Lacquer thinner n-butyl acetate	1,100 gal Total	0	D001
Lacquer isobutyl alcohol methyl ethyl ketone ethyl acetate toluene		0	D001
Paint methyl ethyl ketone isobutyl alcohol	50 gal Total	0	D001

February 15, 1988	Final certification of closure by Estwing and independent professional engineer. Submittal of certification to IEPA.

9. Air Emissions

There is no specific concern with air emissions from this site.

10. Personnel Safety and Fire Prevention

During the scrubbing of the pad and the soil and concrete borings, personnel will wear appropriate clothing (gloves) to protect from skin absorption of solvent material. First aid equipment is available nearby for any skin or eye contact.

11. Decontamination of Pad

The concrete drum storage area is the site where lacquers and thinners have been stored. The following procedure will be utilized to decontaminate this area:

a. All drums will be removed from the area and disposed of through established disposal routes. The lacquer and thinners are normally transported to LWD, Inc. in Kentucky for incineration.

b. The area will be broom cleaned and the floor sweepings will be placed in Estwing's non-hazardous special waste dumpster.

c. The area will be scrubbed with brushes and tri-sodium phosphate. A wet-vac will be used to collect the wash water. The wash water will be placed in a plastic-lined 55-gallon drum.

d. Samples of the virgin wash water and the used wash water will be taken and tested for Total Organic Carbon (TOC). If the TOC of the used wash water is within 7 mg/l of the virgin wash water TOC, the pad will be deemed clean. The used wash water will be sewered to the Rockford Sanitary Sewer, in accordance with the Rockford Industrial Waste Ordinance.

e. If the used wash water contains more than 7 mg/l TOC above the virgin wash water, the wash water will be tested for the following parameters. If any parameter exceeds the action level, the area will be rescrubbed and retested for only the parameters exceeding the proposed action levels.

Parameter	Action Level, mg/l
methyl ethyl ketone	7.2*
toluene	14.4*
isobutyl alcohol	36*

*These levels are based upon the toxicity characteristic concentration proposed in the June 13, 1986 Federal Register in Part 261.24 to identify additional hazardous wastes.

f. The wash water from the pad will be stored in drums until the analytical results are obtained. If the concentrations are below the action levels, then the wash water will be disposed of via the sanitary sewers, in accordance with the Rockford Industrial Waste Ordinance.

g. If the wash water exceeds the action levels, the wash water will be considered a hazardous waste. Disposal via incineration or treatment will be utilized, depending upon the concentrations in the wash water.

12. Soil Clean-up Levels

The soil adjacent to the pad will be sampled at locations described in Section 13. To determine the possibility of organic contamination, a photoionization meter will be used to screen each soil sample. If the reading of the photoionization meter is less than 1 ppm for a given sample, that sample will be deemed "clean" and additional analysis will not be conducted. If, however, organic levels exceed 1 ppm, then a sample will be collected adjacent to that location and analyzed for the four parameters listed in Table 2. If the photoionization meter reading is below 1 ppm, the area sampled will be deemed clean, and no further action will be taken.

These results will be compared to the action levels specified in Table 2. If the concentrations are below Table 2 action levels, then the soil will be deemed "clean," and no further action taken.

If the soil concentrations exceed any of these levels, then those portions of soil will be excavated and landfilled as a hazardous waste.

TABLE 2

ACTION LEVELS FOR SOIL

Parameter	Action Level
Toluene	3 mg/kg*
Methyl ethyl ketone	169 mg/kg*
n-butyl acetate	10 mg/kg**
isobutyl alcohol	10 mg/kg**

*Approved Action Levels in Masonite Corporation's Closure Plan. IEPA reference 0434830001 - DuPage County, August 7, 1986.

**Value specified for ethyl acetate in above approved Closure Plan.

13. Sampling Plan and Analytical Methods

The sampling plan for the drum storage area includes testing of the wash water from the pad cleaning and sampling the existing soil area adjacent to the pad. A horizontal and vertical pattern will be utilized to characterize any potential areas for contamination. In the unpaved areas, soil samples will be taken at depths of 0 to 6 inches and 6 to 12 inches. Figure 4 depicts the sampling grid to be utilized.

The soil sample locations would be located at approximately twelve foot intervals on the south side of the pad at a distance of one foot away from the concrete pad. This distance should be sufficiently close to detect any contaminated soil and yet far enough away to avoid the effects of construction of the pad, such as addition of soil, gravel, or residual construction material.

All samples collected at the storage area will be taken in accordance with Attachment 7 of the IEPA Closure Plan Instructions. These are appropriate since volatile organics would be the primary source of any contamination. A stainless steel sampler (Oak Field Soil Sampler) will be utilized to obtain the soil samples, if possible. Where gravel bed is found beneath the top soil, the Oak Field Soil Sampler will not work, and a scoop and/or shovel will be utilized, as described in SW846 in Section 9.2.2.4, for granular material. Attachment 7 is included with this closure plan for reference purposes. The soil samples will be placed in glass bottles, and will be completely filled with soil and taped shut to prevent the escape of any volatile organics.

Analytical procedures shall be followed in accordance with SW-846, "Test Methods for Evaluating Solid Waste, Physical/ Chemical Methods," for non-halogenated volatile organics.

14. Description of Contaminated Soil Removal

If, upon testing, the soil is deemed not to be "clean," then the following procedure would be followed:

a) For any area where the organic levels exceeded the action level, the results would be reviewed by depth increments. If it appears that contamination is limited

to the top 6 inches, then that area is targeted for removal. Likewise, if the top 12 inches are identified as contaminated, then that depth will be utilized for clean-up purposes.

b) The area requiring clean-up activities will be based upon 6-foot increments and the sampling data.

c) Contaminated soil will be excavated to the specified depth and removed to a licensed hazardous waste disposal facility.

d) If the contamination was to the 12-inch depth, then upon removal of the contaminated soil, the bottom and sides of the excavation will be re-sampled to assure that all contaminated areas have been removed. If only the 0-6 inch sample shows contamination, no additional testing is planned.

e) If the second round of analytical results is below the action level, then clean material will be utilized to fill in the excavation. If the concentrations exceed the action level, then the excavation and sampling procedure will be repeated.

15. Description of Equipment Cleaning

All equipment utilized to remove and sample the soil will be scraped and washed to remove waste residues. The residual scrapings will be added to the excavated material for disposal.

The soil sampling equipment will be cleaned between each sampling location, utilizing the procedure in Attachment 7.

16. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature Norman Ettering

Title President

Date June 25, 1987

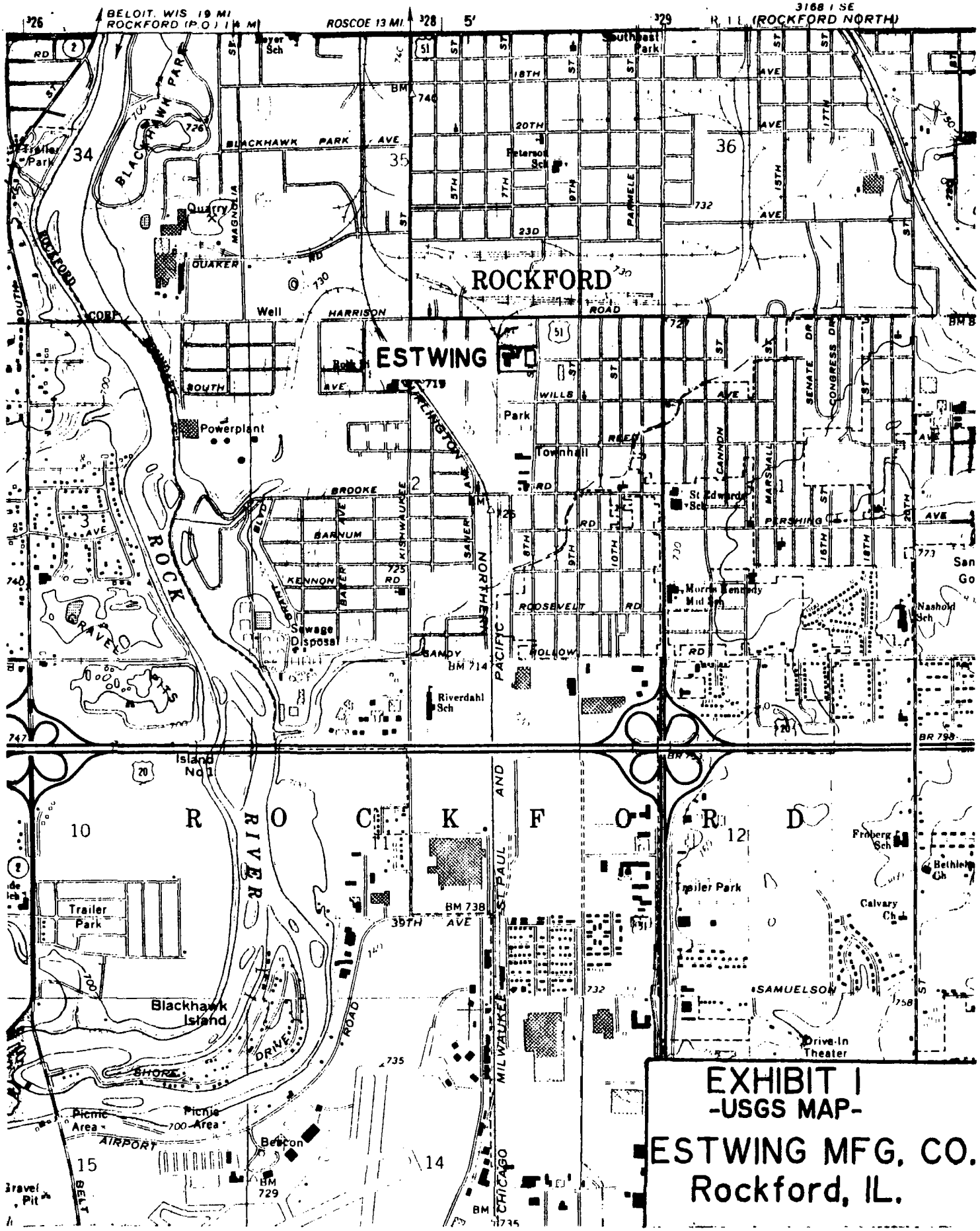


EXHIBIT I
-USGS MAP-
ESTWING MFG. CO.
Rockford, IL.

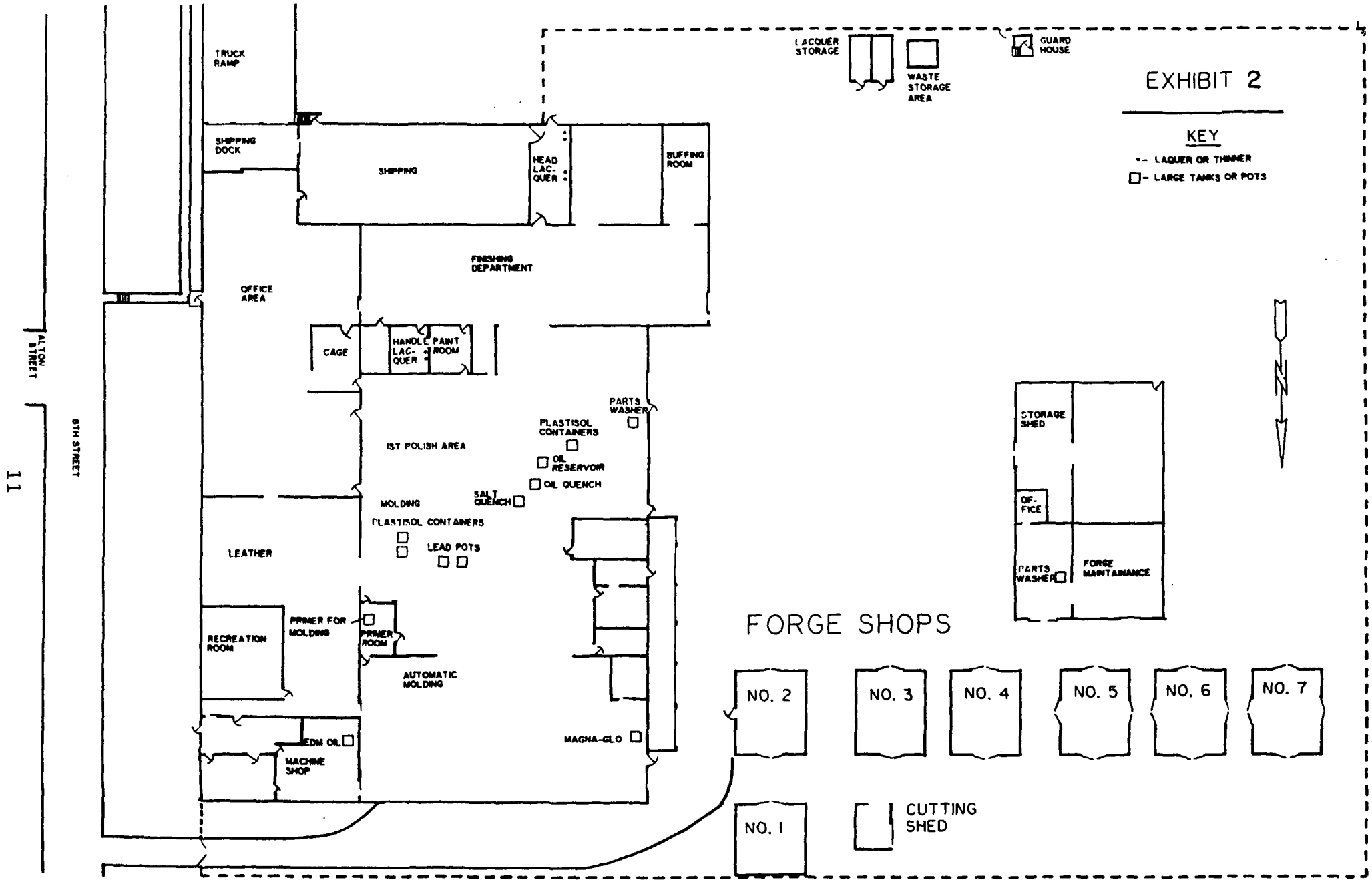


EXHIBIT 2
KEY
- LAQUER OR THINNER
- LARGE TANKS OR POTS
LACQUER STORAGE
WASTE STORAGE AREA
GUARD HOUSE
TRUCK RAMP
SHIPPING DOCK
SHIPPING
HEAD LAC-QUER
BUFFING ROOM
FINISHING DEPARTMENT
OFFICE AREA
CAGE
HANDLE PAINT LAC-QUER
PAINT ROOM
PARTS WASHER
PLASTISOL CONTAINERS
1ST POLISH AREA
OIL RESERVOIR
OIL QUENCH
SALT QUENCH
MOLDING
PLASTISOL CONTAINERS
LEAD POTS
LEATHER
RECREATION ROOM
PRIMER FOR MOLDING
PRIMER ROOM
AUTOMATIC MOLDING
EDM OIL
MACHINE SHOP
MAGNA-GLO
ALTON STREET
8TH STREET
STORAGE SHED
OF-FICE
PARTS WASHER
FORGE MAINTAINANCE
FORGE SHOPS
NO. 2
NO. 3
NO. 4
NO. 5
NO. 6
NO. 7
NO. 1
CUTTING SHED

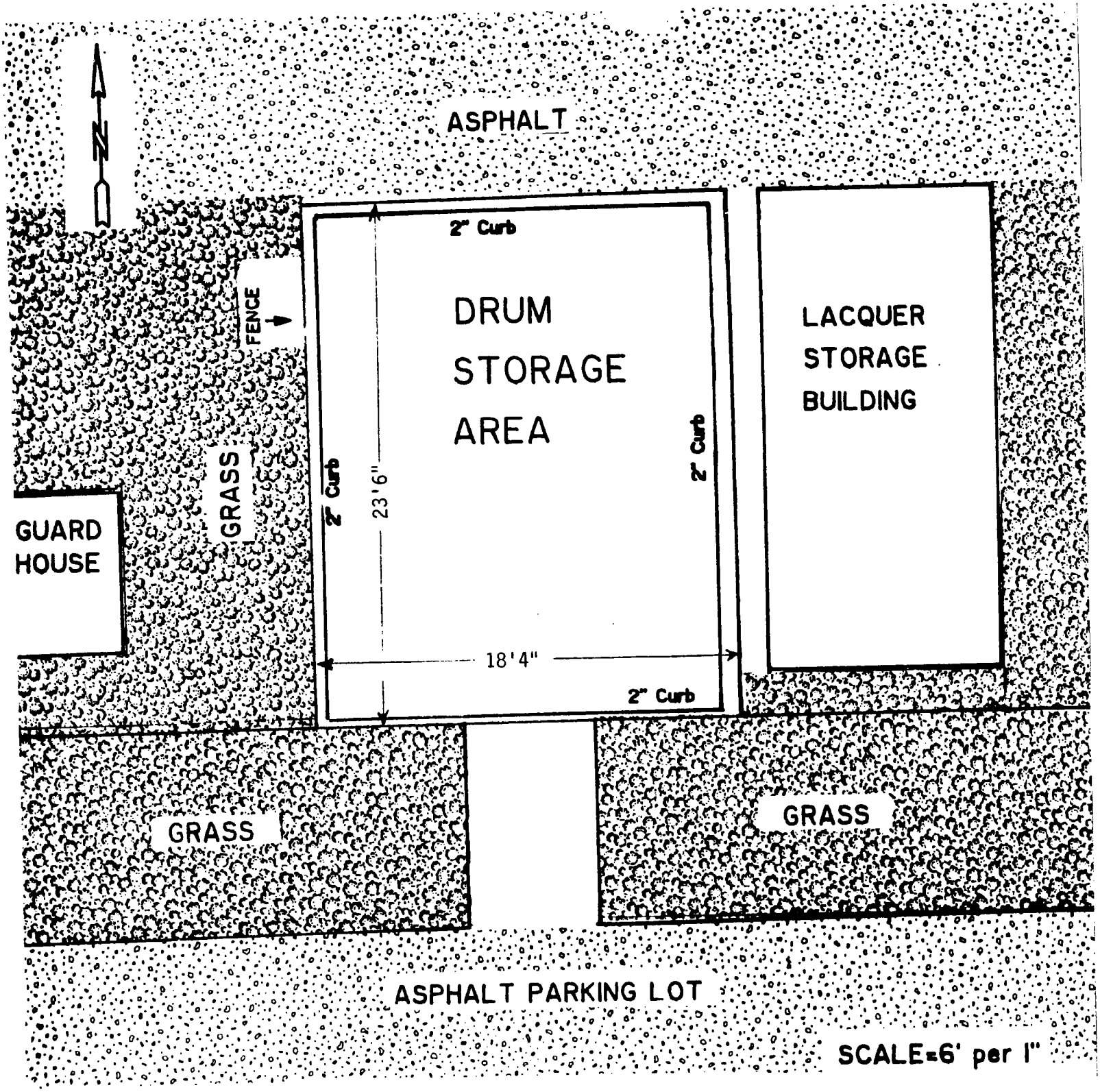
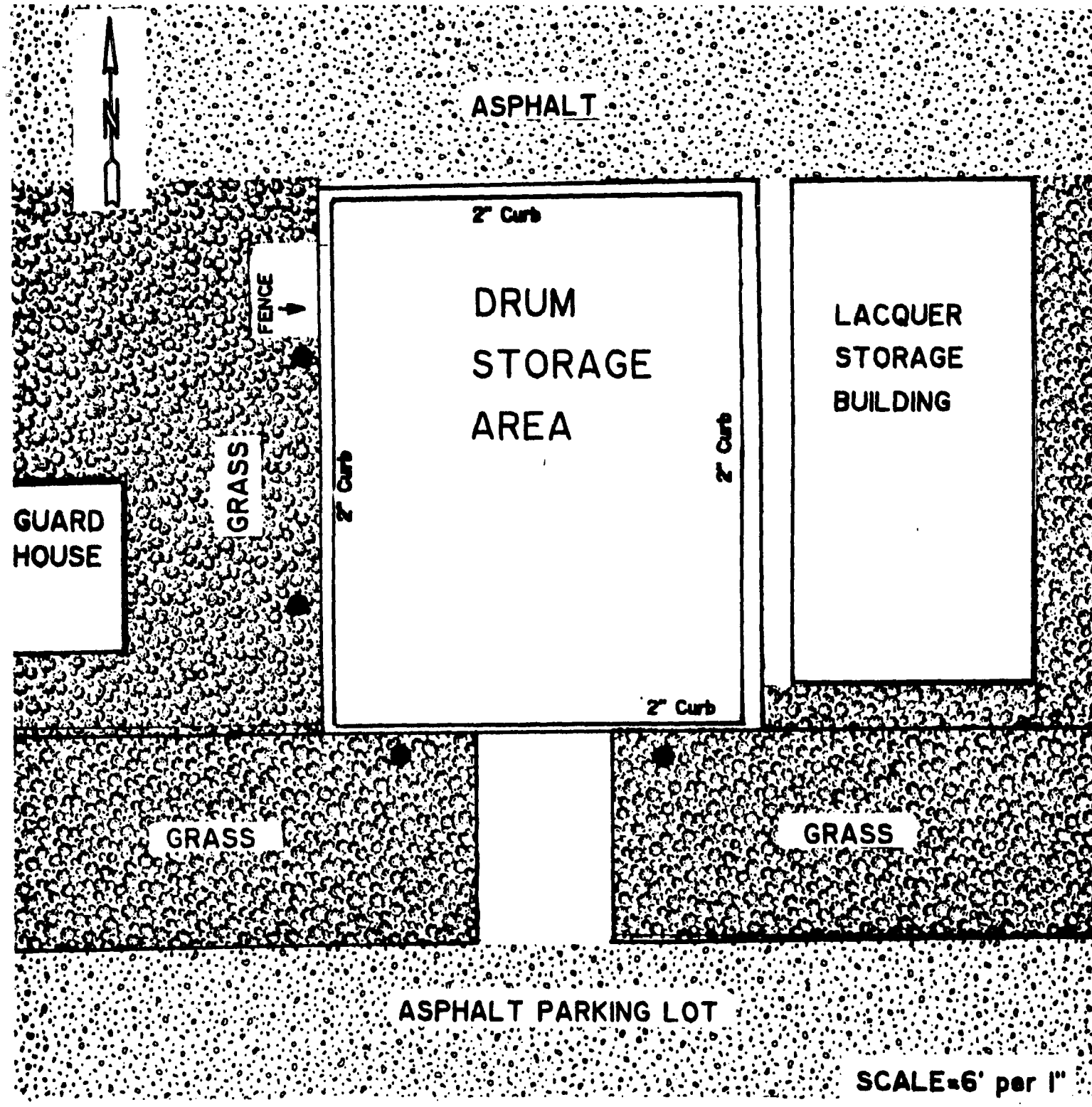


EXHIBIT 3

PLAN VIEW



● SAMPLING LOCATIONS
EACH SAMPLING LOCATION IS 1'
OFF THE DRUM STORAGE AREA

EXHIBIT 4

PROPOSED SAMPLING GRID

Attachment 7

SOIL VOLATILE SAMPLING PROCEDURES

A. PREPARATION AND DECONTAMINATION OF STAINLESS STEEL SOIL SAMPLERS

*1. Wash tubing or sampler with hot water and a nonfoaming detergent, such as trisodium phosphate.

2. Rinse with hot water.

*3. Rinse with a pesticide grade solvent, such as hexane.

4. Rinse with very hot water to drive off solvent.

5. Rinse with deionized water.

6. Store the sampler in aluminum foil until ready for use.

*Consult the laboratory for specific recommendations.

B. SOIL SAMPLING FOR VOLATILE ORGANICS

1. Using a properly decontaminated and stored stainless steel sampler (refer to preparation and decontamination instructions), take a core sample of soil.

2. Add additional clay to the ends of the sample, if necessary, to eliminate headspace.

3. Cover both ends of the sampler with aluminum foil. Cover the aluminum foil with a plastic cap, such as a thread protector.

4. Put the sample on ice immediately.

5. Transport the samples to the laboratory as soon as possible. Most labs require delivery within 24 hours of sampling.

NOTE: Soil samples which will be tested for volatile organics cannot be composited because of the volatilization which would result from any compositing method.

BC:rd/sp0799F/1-20

Attachment 2

CERTIFICATION REGARDING POTENTIAL RELEASES FROM SOLID WASTE MANAGEMENT UNITS (CLOSURE PLAN REVIEW)

FACILITY NAME: ESTWING MANUFACTURING COMPANY

EPA I.D. NUMBER: ILD 005 212 394

LOCATION CITY: Rockford

STATE: Illinois

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTES UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION and in your closure plan.

	YES	NO
• Landfill		✓
• Surface Impoundment		✓
• Land Farm		✓
• Waste Pile		✓
• Incinerator		✓
• Storage Tank (Above Ground)		✓
• Storage Tank (Underground)		✓
• Container Storage Area	✓	
• Injection Wells		✓
• Wastewater Treatment Units		✓
• Transfer Stations		✓
• Waste Recycling Operations		✓
• Waste Treatment, Detoxification		✓
• Other Leather dust dewatering area	✓	

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed on and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location at facility, provide a site plan if avaliable.

Dewatering area, approximately 25 ft X 50 ft in size, received leather dust sludge from a wet scrubber. Waste is non-hazardous. Analysis for leather dust sludge is attached. All material will be removed by August 1, 1987 and landfilled. Awaiting IEPA approval. Also quench oil containers (non-hazardous) are accumulated until an economic load is obtained.

NOTE: Hazardous waste are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application and in your closure plan. please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the part or still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released .
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

   No releases recorded or known for these units.

4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases, Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

   Not applicable.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Norman Estwing, President
Typed Name and Title

Norman Estwing
Signature

June 25, 1987
Date

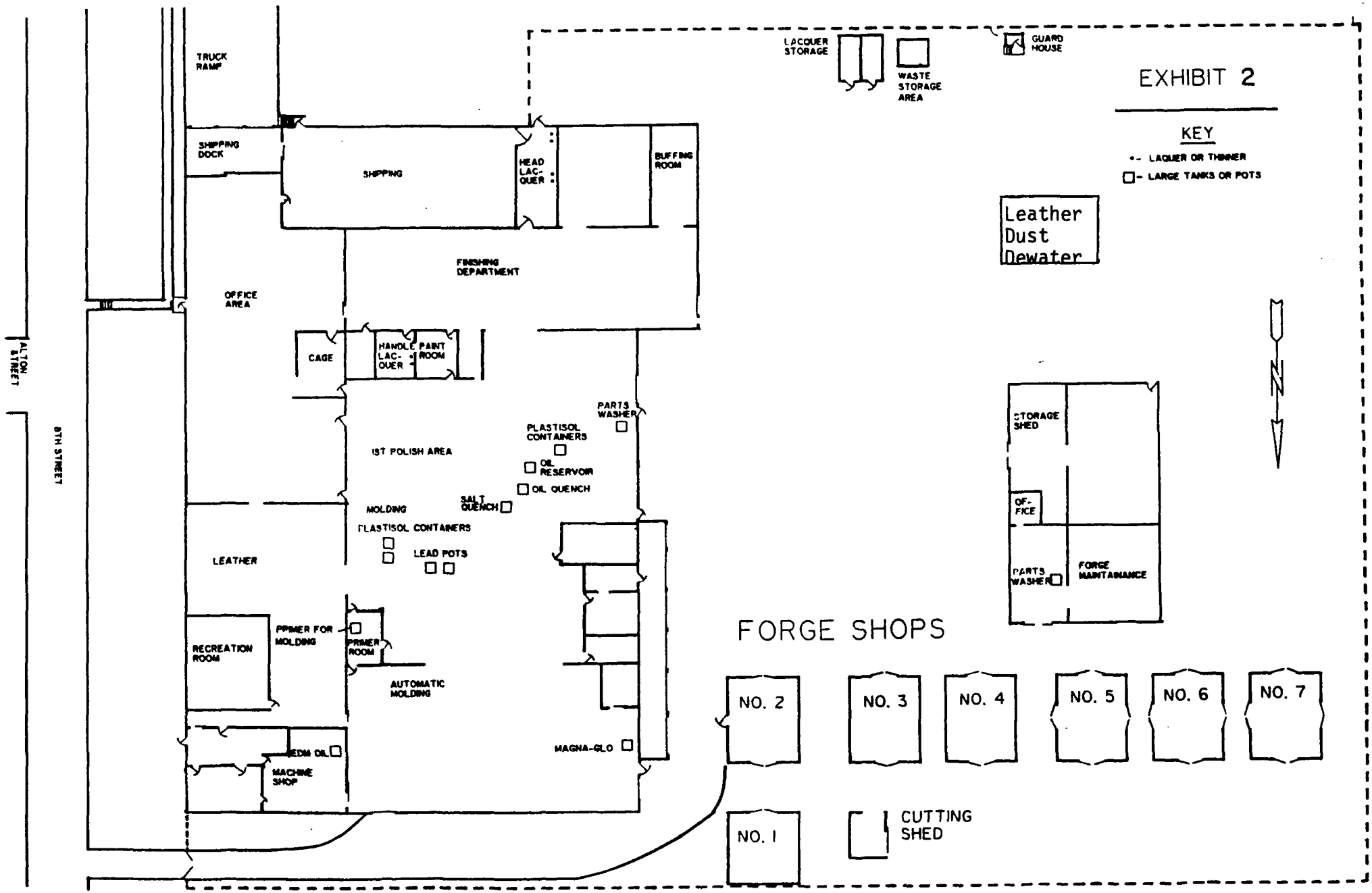


EXHIBIT 2
KEY
- LACQUER OR THINNER
- LARGE TANKS OR POTS
TRUCK RAMP
SHIPPING DOCK
SHIPPING
HEAD LACQUER
BUFFING ROOM
FINISHING DEPARTMENT
OFFICE AREA
CAGE
HANDLE LACQUER
PAINT ROOM
PARTS WASHER
PLASTISOL CONTAINERS
1ST POLISH AREA
OIL RESERVOIR
OIL QUENCH
SALT QUENCH
MOLDING
PLASTISOL CONTAINERS
LEAD POTS
LEATHER
RECREATION ROOM
PRIMER FOR MOLDING
PRIMER ROOM
AUTOMATIC MOLDING
EDM OIL
MACHINE SHOP
MAGNA-GLO
LACQUER STORAGE
WASTE STORAGE AREA
GUARD HOUSE
Leather
Dust
Dewater
STORAGE SHED
OFFICE
PARTS WASHER
FORGE MAINTAINANCE
FORGE SHOPS
NO. 1
NO. 2
NO. 3
NO. 4
NO. 5
NO. 6
NO. 7
CUTTING SHED
ALTON STREET
8TH STREET

CBC ENVIRONMENTAL SERVICES

RECEIVED MAY 1 1 1987

5/06/87 LABORATORY REPORT PAGE 1

E186 8414484 W29

ESTWING MANUFACTURING COMPANY
2647 8TH STREET
ROCKFORD ,IL 61101
ATTN: DARRELL STELLINGWERF

Copy

SAMPLE 87106-E02328 4-8 SOLID WASTE
DATE COLLECTED 4/14/87 DATE RECEIVED 4/16/87

TEST NAME	RESULT	UNITS	EP TOXICITY		EP LIMIT	HAZ.CODE
ACID COMPATIBILITY	REACTIVE	PPM				
BASE COMPATIBILITY		PPM				
	NO REACTION					
WATER COMPATIBILITY		PPM				
	NO REACTION					
EXTRACTABLE ORGANIC HALIDE	<20	PPM				
COLOR	BLACK					
LOAD BEARING(PENETROMETER)	<0.5	TON/SQF				
CADMIUM - TOTAL	9.1	PPM	0.06	MG/L	1.0	
CHROMIUM - TOTAL	34	PPM	0.01	MG/L	5.0	
LEAD - TOTAL	980	PPM	0.1	MG/L	5.0	
BARIUM - TOTAL	39	PPM				
SILVER - TOTAL	<0.1	PPM				
SELENIUM - TOTAL	<0.020	PPM				
MERCURY - TOTAL	0.10	PPM				
ACIDITY, AS CACO3	140	PPM				
ALKALINITY TOTAL, AS CACO3	25	PPM				
PH (UNITS)	6.0 10%				2.0-12.5	
TOTAL CYANIDE	<10	PPM				
REACTIVE CYANIDE	<10	PPM				
TOTAL SULFIDE	358	PPM				
REACTIVE SULFIDE	<1.0	PPM				
TOTAL ORGANIC CARBON	24000	PPM				
FLASH POINT (FAHRENHEIT)	>210	DEG. F			140.0	
SPECIFIC GRAVITY	2.4	G/ML				
TOTAL SOLIDS	49	%				

METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES, 1979, EPA-600/4-79-020.
TEST METHODS FOR EVALUATING SOLID WASTE, PHYSICAL/CHEMICAL METHODS, 1982, EPA SW846.
IF YOU HAVE ANY QUESTIONS PLEASE CONTACT OUR CLIENT SERVICE DEPARTMENT.
ANY REMAINING WASTE SAMPLES WILL BE RETURNED TO THE ADDRESS LISTED ABOVE 8 WEEKS FROM THE RECEIVING DATE OF THIS REPORT. WI DNR LAB CERTIFICATION #241283020/A.I.H.A. ACCREDITED.
N/T - NOT TESTED N/A - NOT APPLICABLE APPROVAL

CHEM-BIO CORPORATION
140 E. RYAN ROAD *OAK CREEK, WI 53154-4599* *(414) 764-7005 (800) 592-5900 DT 332*

CBC-AquaSearch

ENVIRONMENTAL SERVICES:
Analytical, Field & Consulting
Air
Water & Wastewater
Solid & Hazardous Waste
Industrial Hygiene

H198 8407219 JLB

HUFF & HUFF, INC.
512 W BURLINGTON SUITE 206
LA GRANGE ,IL 60525
ATTN: JAMES E. HUFF

SAMPLE 86108-H07494 SCRUBBER SLUDGE
DATE COLLECTED 4/17/86 DATE RECEIVED 4/18/86

TEST NAME	RESULT	UNITS	EP TOXICITY		EP LIMIT	HAZ.CODE
BARIUM - EP			0.1	MG/L	100.0	
CADMIUM - EP			0.030	MG/L	1.0	
CHROMIUM - EP			<0.05	MG/L	5.0	
LEAD - EP			<0.1	MG/L	5.0	
SILVER - EP			<0.01	MG/L	5.0	
ARSENIC - EP			<0.001	MG/L	5.0	
SELENIUM - EP			<0.002	MG/L	1.0	
MERCURY - EP			0.0004	MG/L	0.2	

METHODS FOR CHEMICAL ANALYSIS OF WATER AND WASTES, 1979, EPA-600/4-79-020.
TEST METHODS FOR EVALUATING SOLID WASTE, PHYSICAL/CHEMICAL METHODS, 1982, EPA SW846.
IF YOU HAVE ANY QUESTIONS PLEASE CONTACT OUR CLIENT SERVICE DEPARTMENT AT (414) 764 - 700 OR CALL TOLL FREE; 1-800-592-5900, WAIT FOR DIAL TONE AND DIAL EXTENSION 332.
ANY REMAINING WASTE SAMPLES WILL BE RETURNED TO THE ADDRESS LISTED ABOVE 8 WEEKS FROM THE RECEIVING DATE OF THIS REPORT.

! = REPRINT

APPROVAL

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F I L D 0 0 5 2 1 2 3 9 4 D

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

LABEL ITEMS

- I. EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: *Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.*

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP ESTWING MANUFACTURING COMPANY

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 DEVERS, PAUL, PLANT MANAGER	815 397 9521

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
3 2647 EIGHTH STREET			
B. CITY OR TOWN	**C. STATE**	**D. ZIP CODE**	
4 ROCKFORD	IL	61101	

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
5 2647 Eighth Street			
B. COUNTY NAME			
WINNEBAGO			
C. CITY OR TOWN	**D. STATE**	**E. ZIP CODE**	**F. COUNTY CODE (if known)**
6 ROCKFORD	IL	61101	

CONTINUE ON REVERSE

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA | **EPA**

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

F I L D 0 0 5 2 1 2 3 9 4

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

☐ 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
83		

☐ 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR OR GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP T/A C I

LINE NUMBER	A. PROCESS CODE (From list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (From list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S02	600	G		5				
X-2	T03	20	E		6				
1	S01	2,250	G		7				
2					8				
3					9				
4					10				

ntinued from the front.

PROCESSES *(continued)*

SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

DESCRIPTION OF HAZARDOUS WASTES

EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

ITE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by re than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

AMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds r year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 0 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

O.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

ontinued from page 2.
OTE: Photocopy this page before completing if you have more than 26 wastes to list.

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EPA I.D. NUMBER (enter from page 1)

W	I	L	D	0	0	5	2	1	2	3	9	4		1
1	2											12	13	15

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W	DUP		2	DUP
1	2	13	14	15	23 - 30

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
	23 - 26	27 - 34	35	27 - 28 / 29 - 30 / 31 - 32 / 33 - 34	
1	D 0 0 1	2,000	P	S 0 1	
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
	23 - 26	27 - 34	35	27 - 28 / 29 - 30 / 31 - 32 / 33 - 34	

CONTINUE ON REVERSE

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

F | I L D 0 0 5 2 1 2 3 9 4 | T/A | C 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground--level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
4 2 1 3 3 0	8 9 0 3 3 0

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E Estwing Family	8 1 5 - 3 9 7 - 9 5 2

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F 2647 Eighth Street	G Rockford,	I L	6 1 1 0 1

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Norman Estwing President	Norman Estwing	June 25, 1987

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
	Norman Estwing	June 25, 1987

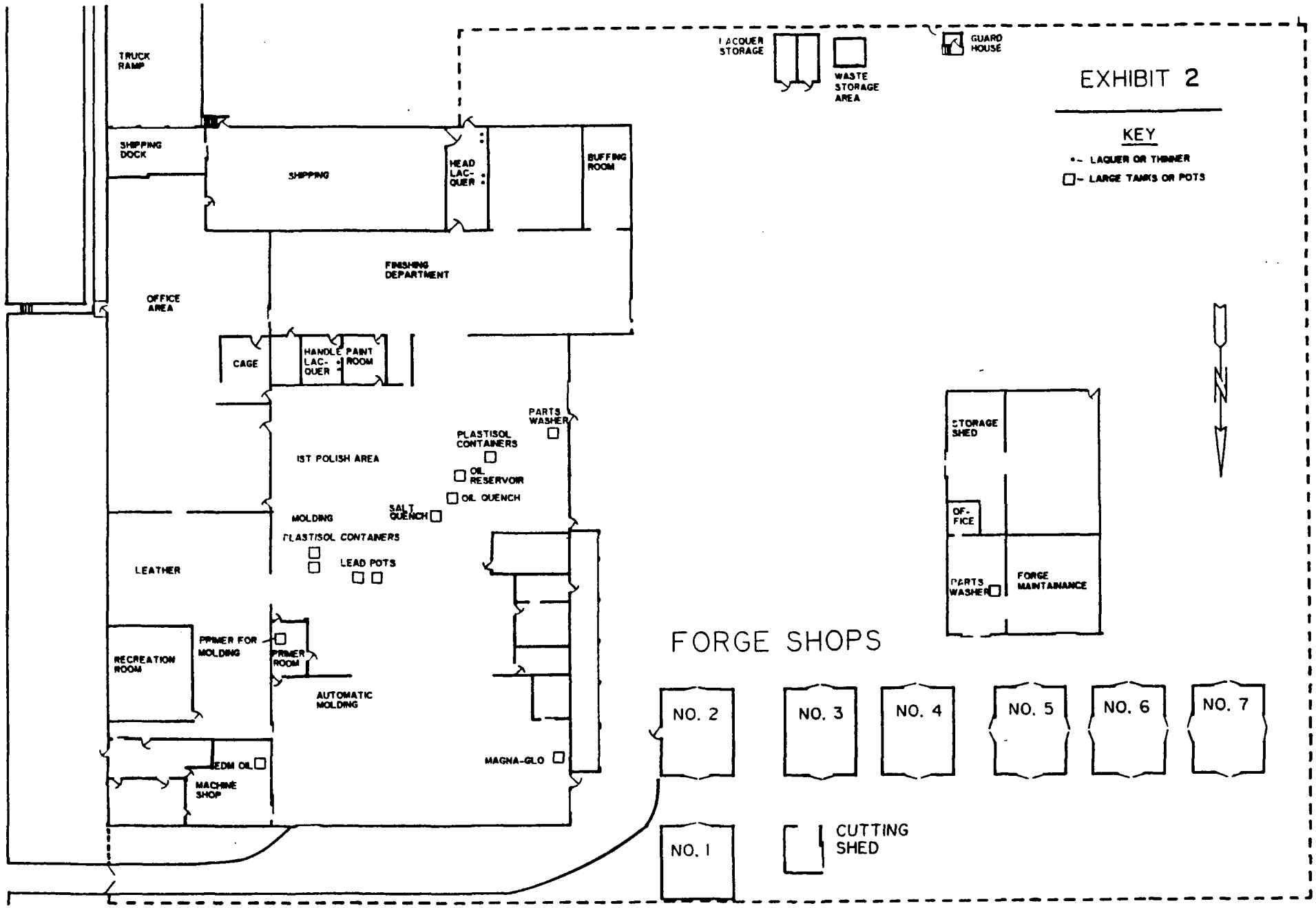
EXHIBIT 2
KEY
•- LACQUER OR THINNER
□- LARGE TANKS OR POTS
LACQUER STORAGE
WASTE STORAGE AREA
GUARD HOUSE
TRUCK RAMP
SHIPPING DOCK
SHIPPING
HEAD LAC-QUER
BUFFING ROOM
FINISHING DEPARTMENT
OFFICE AREA
CAGE
HANDLE PAINT LAC-QUER
PAINT ROOM
PARTS WASHER
PLASTISOL CONTAINERS
OIL RESERVOIR
OIL QUENCH
IST POLISH AREA
SALT QUENCH
MOLDING
PLASTISOL CONTAINERS
LEAD POTS
LEATHER
RECREATION ROOM
PRIMER FOR MOLDING
PRIMER ROOM
AUTOMATIC MOLDING
EDM OIL
MACHINE SHOP
MAGNA-GLO
ALTON STREET
8TH STREET
STORAGE SHED
OF-FICE
PARTS WASHER
FORGE MAINTAINANCE
FORGE SHOPS
NO. 1
NO. 2
NO. 3
NO. 4
NO. 5
NO. 6
NO. 7
CUTTING SHED

Date July 7, 1987

To: Reviewer Name Tom Henninger Region 1

Re: Site Name Estwing

Site No. 2010300086

PEC Date April 27, 1987

STATUS OF VIOLATIONS

Section	Date of Adequate Response Prior to PEC	Schedule for Compliance Date	Resolved	F/U Needed
725.114c		resolved after closure		
725.242a		~~XXXX XX, XXXX~~ " resolved after closure		
725.113b		resolved after closure		
703.121a		" " "		
725.212a		June 30, 1987	yes	
725.173		resolved after closure		
	closure plan received at this office on July 6, 1987			
	a copy is attached.			

If violations remain unresolved, referral to EDG may be appropriate. This cover sheet should be returned to the HWRC as soon as possible after the PEC so that compliance/enforcement status reports may be updated.

Reviewer Signature Thomas Henninger

Return to: HWRC Geordie Smith
Facilities Compliance Unit
Land Pollution Control #24

D 6-29-87
R 7- 6-87

RECEIVED
JUL 13 1987
IEPA/DLPC

IL 532-1308
PC 180 (Rev. 9/86)